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February 6, 2009

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Rosa Lewis Reports Analysis Division Federal Election Commission Washington, DC 20463 2009 FEB 25 A 9 58

Re: Amended July Monthly Report

Dear Ms. Lewis,

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I am writing in response to your Request for Additional Information dated January 14, 2009. Your letter identified six areas of concern.

The first four areas of concern relate to incorrect numbers and calculations on the Summary Pages. These numbers were incorrect because they were inadvertently calculated using the wrong prior report. Rather than beginning with the numbers on the report immediately previous to the July Monthly report, they were calculated using the report previous to that. We have contacted our vendor who prepares these summary numbers, and they are beginning the process of recalculating everything and preparing amended reports to correct the numbers on this and subsequent reports. These amendments will be submitted to the FEC once they are prepared.

The final two areas of concern relate to refunds. The vast majority of transactions which make up ActBlue's federal reports are earmarked contributions. When an earmarked contribution is refunded, the funds must be returned by the recipient committee to ActBlue, and then returned to the original contributor. ActBlue reports the income returning from the recipient committee on Line 16 and the expenditure going back to the original contributor on Line 28(a).

Your letter has requested that we itemize refunds reported on Lines 16 and 28(a) of the Summary page on Schedules A and B, respectively. We have done this. The refunds returned from the recipient committee to ActBlue and reported on Line 16 have been itemized on Schedule A from page 19517 to pave 19523; and the refunds sent by ActBlue back to the original contributors and reported on Line 28(a) have been itemized on Schedule B from page 34814 to page 34820.

I believe this responds to all of the concerns raised in your letter. If you require any further information, please feel free to contact me at (617) 517-7600.

Sincerely,

Steven Gold Staff Counsel

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